Exhibit "A"

	SHERIFF'S ENTRY OF SERVICE		
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Mg 4.8	Superior Court ☐ State Court ☐		TOEWA!!
	Attorney's Address Tustin Tones	•	
	7505 Waters Ave		# T
	E-5 Saronnel, ga 31406	Civil Action No. <u>37. V 27. 3</u>	li .
	₹	Date Filed	i i
3.	Name and Address of Party to be Served	\(\frac{1}{2} \)	1
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	Market I to the Collins		
	Lin And Part of the form		Plaintiff
			VS.
2		The Knyer Co	milary.
		The Knger Co	bis County
	Garnishee		Defendant
PERSONAL	I have this day served the defendant of the within action and summons.		personally with a copy
<u>δ</u> .	I have this day served the defendant		by leaving
NOTORIOUS	a copy of the action and summons at his most notorious place of abo	The state of the s	
-	Delivered same into hands of		e, about years; e of defendant.
Served the defendant The KNOGET COMPANY			a corporation
ROGRPOR ME	in phases of the office and place of daing business of said Coursetting in this Course		of Cabo
TACK & MAIL S. CORPORATION	I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United State Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postal affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.		the same to the door of the same in the United States ons, with adequate postage
NON EST	Diligent search made and defendant		,
		Appendix a second secon	
	This day of	Se Cole	on 94019
	This	DEPUTY, COBB COUNTY, C	



IN THE STATE COURT OF CHATHAM COUNTY STATE OF GEORGIA

DANIEL RAPPOSELLI,	
Plaintiff,	,)
v.	Civil Action File No.: STCV22-01167
THE KROGER COMPANY,	
Defendant.)

SUMMONS

TO: The Kroger Company

c/o its registered agent: CSC of Cobb County, Inc.

192 Anderson Street SE, Suite 125

Marietta, Georgia, 30060

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

Justin T. Jones, Esq. 7505 Waters Avenue, Suite B-5 Savannah, GA 31406

An answer to the complaint, which is herewith served upon you, within thirty (30) days after service of this summons upon you, exclusive of the date of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

This 12th day of July, 2022.

/s/ Rebekah Jenkins

Deputy Clerk, Chatham County State Court



IN THE STATE COURT OF CHATHAM COUNTY STATE OF GEORGIA

DANIEL RAPPOSELLI,)
Plaintiff,))
v.	STCV22-01167) Civil Action File No.:
THE KROGER COMPANY,)
Defendant.))

COMPLAINT FOR DAMAGES

COMES NOW, Daniel Rapposelli, and states his complaint against The Kroger Company as follows:

1.

Defendant is a foreign for-profit corporation authorized to do business in the State of Georgia, with principal offices located in Cincinnati, Ohio.

2.

Defendant maintains offices and transacts business in Chatham County, Georgia, the county in which this cause of action originated.

3.

Defendant The Kroger Company may be served with process through it registered agent CSC of Cobb County, Inc. at 192 Anderson Street SE, Suite 125, Marietta, Georgia, 30060.

4.

Defendant The Kroger Company is subject to the jurisdiction of this Court.

5.

Because this cause of action originated in Chatham County, venue of this action is proper in this Court.

Brian K. dhart - Clerk of Court

6.

At all times material hiseto, Defendant owned and/or was in control of The Kroger Company's store located at 495 Johnny Mercer Boulevard, Savannah, Georgia 31410 ("the premises").

7.

At all times material hereto, Defendant possessed the premises with the intent to occupy and control it and held it open to the public for business purposes.

8.

Based upon information and belief, on or about January 27, 2022, Defendant was operating a retail store on the premises.

9.

On or about January 27, 2022, Plaintiff entered said premises for the purpose of purchasing goods from the subject retail store.

10.

On or about January 27, 2022, upon entering said premises, Plaintiff held the legal status of an invitee as such term is defined under Georgia Law.

11.

On or about January 27, 2022, Plaintiff was shopping on the premises when he slipped on an unknown substance and suffered serious injury to his person.

12.

Because Defendant owned and operated the premises, it owed a legal duty of reasonable care to invitees to inspect and keep the premises in a safe condition and to warn invitees of hidden dangers or defects that were not discoverable in the exercise of reasonable care.

Brian Holler t-Clerk of Court

13.

Before Plaintiff's fall, Defendant, by and through its employees, had actual or constructive knowledge of the hazardous condition which caused Plaintiff's fall.

14.

Before Plaintiff's fall, Plaintiff had no knowledge of the unsafe and dangerous condition and it was not discoverable by his in the exercise of reasonable care.

15.

At all relevant times hereto, Plaintiff exercised reasonable care for his own safety.

16.

Defendant breached its duty of reasonable care in one or more of the following respects in violation of O.C.G.A. § 51-3-1:

- a) Defendant failed to inspect the premises for dangerous conditions;
- b) Defendant failed to warn patrons of a dangerous condition it knew or should have known existed; and
- c) Defendant failed to remedy said dangerous condition when it knew or should have known it existed.

17.

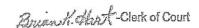
As a direct and proximate result of Defendant' negligence, Plaintiff was forced to seek medical treatment.

18.

As a direct and proximate result of Defendant's negligence, Plaintiff was forced to incur medical expenses in an amount not less than \$11,700.95.

19.

As a direct and proximate result of Defendant's negligence, Plaintiff has endured significant pain and suffering.



PRAYER FOR RELIEF

WHISEFORE, Plaintiff prays:

- a. That Defendant be served with summons, process, and a copy of this Complaint;
- b. For a trial by a jury;
- c. For judgment in favor of Plaintiff and against Defendant;
- d. That Plaintiff be awarded all special damages allowed by law in an amount to be proved at trial;
- e. That Plaintiff be awarded all general damages allowed by law in an amount to be determined by the enlightened conscience of a fair and impartial jury; and
- f. Such other and further relief as the Court deems just and proper.

This 12th day of July, 2022.

JUSTIN T. JONES, PC

7505 Waters Avenue, Suite B-5 Savannah, Georgia 31406 Telephone: (912) 231-7813 Facsimile: (912) 231-7814

justin@justinjoneslaw.net Attorney for Plaintiff /s/ Justin T. Jones JUSTIN T. JONES Georgia Bar No. 155422